

July 30, 1985

Docket Nos. 50-325/324

Mr. E. E. Utley
Executive Vice President
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602

Dear Mr. Utley:

The Commission has issued the enclosed Amendment Nos. 88 and 113 to Facility Operating License Nos. DPR-71 and DPR-62 for the Brunswick Steam Electric Plant, Units 1 and 2. The amendments consist of changes to the Technical Specifications in response to your submittal of September 7, 1982, as supplemented April 13, 1984, May 7, and July 2, 1985.

The amendments change the Technical Specifications by revising Section 3/4.6.1 to revise the surveillance requirements and the associated footnote relative to the 31-day interval for primary containment integrity demonstration.

The September 7, 1982 amendment request included eight attachments. Attachments 1 through 6 have been reviewed and were issued on March 6, 1984 as Amendment Nos. 66 and 92. Attachment 7 is the subject of the enclosed amendments. We have terminated our review of Attachment 8, since it is our understanding that your staff is no longer interested in this change.

A copy of the related Safety Evaluation is also enclosed.

Sincerely,

Original signed by/

Marshall Grotenhuis, Project Manager
Operating Reactors Branch #2
Division of Licensing

Enclosures:

- 1. Amendment No. 88 to License No. DPR-71
- 2. Amendment No. 113 to License No. DPR-62
- 3. Safety Evaluation

cc w/enclosures:

See next page

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Handwritten signatures and initials:
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Mr. E. E. Utley
Carolina Power & Light Company
Brunswick Steam Electric Plant; Units 1 and 2

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-325

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 88
License No. DPR-71

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Carolina Power & Light Company (the licensee) dated September 7, 1982, as supplemented April 13, 1984, May 7, and July 2, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-71 is hereby amended to read as follows:

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2. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 88, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 30, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 88

FACILITY OPERATING LICENSE NO. DPR-71

DOCKET NO. 50-325

Revise the Appendix A Technical Specifications as follows:

Remove

3/4 6-1

Insert

3/4 6-1

3/4.6 CONTAINMENT SYSTEMS3/4.6.1 PRIMARY CONTAINMENTPRIMARY CONTAINMENT INTEGRITYLIMITING CONDITION FOR OPERATION

3.6.1.1 PRIMARY CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: CONDITIONS 1, 2, and 3.

ACTION:

Without PRIMARY CONTAINMENT INTEGRITY, restore PRIMARY CONTAINMENT INTEGRITY within 2 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 PRIMARY CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all primary containment penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in position, except as provided in Table 3.6.3-1 or Specification 3.6.3.
- b. By verifying each primary containment air lock OPERABLE per Specification 3.6.1.3.
- c. By verifying the suppression pool OPERABLE per Specification 3.6.2.1.

* Except valves, blind flanges, and deactivated automatic valves which are located inside the containment, the MSIV Pit, the RWCU Penetration Triangle Room, or the TIP Room, and are locked, sealed, or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except such verification need not be performed when the primary containment has not been de-inerted since the last verification or more often than once per 92 days. Those valves located above the drywell head requiring head shield block removal for verification will be verified prior to each replacement of the shield blocks.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CAROLINA POWER & LIGHT COMPANY

DOCKET NO. 50-324

BRUNSWICK STEAM ELECTRIC PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 113
License No. DPR-62

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Carolina Power & Light Company (the licensee) dated September 7, 1982, as supplemented April 13, 1984, May 7, and July 2, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-62 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 113, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: July 30, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 113

FACILITY OPERATING LICENSE NO. DPR-62

DOCKET NO. 50-324

Revise the Appendix A Technical Specifications as follows:

Remove

3/4 6-1

Insert

3/4 6-1

3/4.6 CONTAINMENT SYSTEMS3/4.6.1 PRIMARY CONTAINMENTPRIMARY CONTAINMENT INTEGRITYLIMITING CONDITION FOR OPERATION

3.6.1.1 PRIMARY CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: CONDITIONS 1, 2, and 3.

ACTION:

Without PRIMARY CONTAINMENT INTEGRITY, restore PRIMARY CONTAINMENT INTEGRITY within 2 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 PRIMARY CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all primary containment penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in position, except as provided in Table 3.6.3-1 or Specification 3.6.3.
- b. By verifying each primary containment air lock OPERABLE per Specification 3.6.1.3.
- c. By verifying the suppression pool OPERABLE per Specification 3.6.2.1.

* Except valves, blind flanges, and deactivated automatic valves which are located inside the containment, the MSIV Pit, the RWCU Penetration Triangle Room, or the TIP Room, and are locked, sealed, or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except such verification need not be performed when the primary containment has not been de-inerted since the last verification or more often than once per 92 days. Those valves located above the drywell head requiring head shield block removal for verification will be verified prior to each replacement of the shield blocks.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 88 TO FACILITY LICENSE NO. DPR-71 AND
AMENDMENT NO. 113 TO FACILITY LICENSE NO. DPR-62
CAROLINA POWER & LIGHT COMPANY
BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2
DOCKET NOS. 50-325 AND 50-324

1.0 INTRODUCTION

By letter dated September 7, 1982, as supplemented April 13, 1984, May 7, and July 2, 1985, the Carolina Power and Light Company (the licensee/CP&L) submitted proposed changes to the Technical Specifications (TS) appended to Facility Operating License Nos. DPR-71 and DPR-62 for the Brunswick Steam Electric Plant, Units 1 and 2. The proposed changes modify the TS Section 3/4.6.1 of the facility's Technical Specifications as indicated in Attachment 7 of the September 7, 1982 letter. The proposed changes would modify the Technical Specifications to revise the surveillance requirements and the associated footnote relative to the 31-day interval for primary containment integrity demonstration.

The September 7, 1982 application consisted of eight attachments. Attachments 1 through 6 have been reviewed and were issued on March 6, 1984 as Amendment Nos. 66 and 92. Attachment 7 is the subject of this evaluation. Attachment 8 will be handled separately.

On May 7, 1985 the licensee submitted new TS pages which specifically identified the high radiation areas which are secured in a closed position, i.e., the main steam isolation valve (MSIV) pit, the reactor water cleanup (RWCU) room, the transient in-core probe (TIP) room and the drywell head area. These areas had been identified in the application but had not been specifically identified in the TS. In addition, administrative corrections were made to make the footnote correspond more closely to the BWR-4 Standard Technical Specifications (STS) and to correct an error in a TS number. On July 2, 1985 the licensee noted that the RWCU room should more properly be called the RWCU penetration triangle room and submitted a new TS page which made this correction. These changes were not significant changes in the technical content of the amendment and would not change the notice. Therefore, a supplemental notice was not issued for either of the two supplemental submittals.

2.0 EVALUATION

The licensee notes that the existing TS in Section 4.6.1.1 require that primary containment integrity be demonstrated on a 31-day basis by the

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verification of (1) containment penetrations being closed; and (2) equipment hatches being sealed. Such verification is not required for penetrations which are locked or secured inside primary containment or for penetrations verified as closed during the previous 92 days.

The licensee proposes to delete TS 4.6.1.1.a.2 in which it is explicitly stated that the equipment hatches be verified as closed and sealed, since TS 4.6.1.1.a.1 addresses all penetrations which include the equipment hatches. The NUREG-0123 current Boiling Water Reactor (BWR/4) Standard Technical Specifications (STS) now specify surveillance requirements for penetrations rather than providing separate requirements for the containment's equipment hatches. The deletion of TS 4.6.1.1.a.2 is consistent with the STS guidance and we find it acceptable.

The licensee further proposes to add the following areas to the footnote of TS 4.6.1.1.a.1: The MSIV pit, the RWCU penetration triangle room, the TIP room and the drywell head area. This proposed change concerns high radiation areas and provides relief from the 31-day verification requirements of TS 4.6.1.1 for containment penetrations which are inaccessible due to high radiation. Requiring this surveillance to be performed once every 31 days unnecessarily exposes personnel to high radiation fields, which is contrary to the requirements of 10 CFR 20.1C. Administrative controls are already in place which ensure that proper valve alignment is maintained. We find this acceptable.

Shield plugs prevent access to the MSIV pit and the drywell head area. Procedures currently exist which require valve and flange position verification prior to the installation of shield plugs for the drywell head area. These valves located above the drywell head requiring head shield block removal for verification will be verified prior to each replacement of the shield blocks. Administrative controls are in place which require the shield plugs for the MSIV pit to be in place when the plant is in Operational Conditions 1, 2 and 3. Valve and flange positions are verified during system lineup. Access is limited by the shield plugs thereby ensuring correct valve alignments. Therefore, we find redundant verification of valve alignments every 31 days is not necessary.

The TIP room contains the test connections between the MSIVs, the feedwater check valves, and the steam line drain valves all of which are locked in the closed position. Administrative controls ensure that the TIP room remains locked closed. In addition, the valve position is verified prior to startup. These measures provide adequate assurance that the valves are positioned correctly. Therefore, we find yielding the 31-day surveillance requirement unnecessary.

Administrative controls ensure that the RWCU penetration triangle room remains locked at all times with a work permit containing a detailed job description required for entry. Valves requiring surveillance in this area are the Local Leak Rate Test (LLRT) test connections, the O-ring test connections, and the body drain valves. Alignment of these valves is

verified during each system lineup. The measures, taken together, ensure correct valve alignment; thus, we find the 31-day surveillance requirements are not necessary.

TS 4.6.1.1 still requires that penetrations in the above mentioned areas shall be verified closed during each cold shutdown, except that such verification need not be performed when the primary containment has not been de-inerted since the last verification or more often than once per 92 days.

Based on our review and the above discussion, we conclude that the proposed changes to the Technical Specifications, which revise the surveillance requirements and associated footnote relative to the 31-day interval on primary containment integrity demonstration, are acceptable.

3.0 ENVIRONMENTAL CONSIDERATIONS

The amendments involve a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: L. Ruth, M. Lamastra and M. Grotenhuis

Dated: July 30, 1985